

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action No. 05-10122 RGS

FRANK LILL & SON, INC.,

Plaintiff,

v.

MEDICAL AREA TOTAL ENERGY  
PLANT, INC.,

Defendant.

~~ASSENTED TO~~ MOTION FOR ADMISSION OF COUNSEL PRO HAC VICE

Pursuant to Local Rule 83.5.3(b), plaintiff Frank Lill & Son, Inc. ("Lill"), by and through its counsel, John J. McNamara, Esquire, Leonard D. Zamansky, Esquire and the law firm of Domestico, Lane & McNamara, LLP, moves for the admission of Martha A. Connolly, Esquire, and the law firm of Ernstrom & Drete, LLP, pro hac vice, for purposes of practicing before this Court in the above-captioned matter. In further support of this motion, Lill states as follows:

1. This is an action wherein Lill seeks to recover money damages against defendant Medical Area Total Energy Plant, Inc. ("MATEP") based upon claims of breach of contract, quantum meruit and unjust enrichment for extra work performed by Lill for MATEP on a construction project

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known as the Installation of Phase 3 Piping Systems at the MATEP facility in Boston, Massachusetts.

2. Lill is currently represented by John J. McNamara, Esquire, Leonard D. Zamansky, Esquire and the law firm of Domestico, Lane & McNamara, LLP. Messrs. McNamara and Zamansky are members in good standing of the bars of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts.

3. Ms. Connolly is a member in good standing of the bars of the State and Federal Courts of New York and State Court of Connecticut, there are no disciplinary proceedings pending against her as a member of the bar in any jurisdiction, and she is familiar with the Local Rules of the United States District Court for the District of Massachusetts. See Affidavit of Martha A. Connolly attached hereto as Exhibit "A."

4. Ms. Connolly is seeking admission pro hac vice for the purpose of representing Lill in this litigation only and agrees to observe and to be bound by the Local Rules of the United States District Court for the District of Massachusetts.

5. Defendant's counsel has assented to this motion.

WHEREFORE, Frank Lill & Son, Inc. respectfully requests this Court allow Martha A. Connolly, Esquire, and

the law firm of Ernstrom & Drete, LLP to practice before  
this Court pro hac vice.

ASSENTED-TO,

MEDICAL AREA TOTAL  
ENERGY PLANT, INC.,  
By its attorneys,

*Michael B. Meyer (by LOZ permission)*  
Michael B. Meyer  
BBO #344440  
John M. Connolly  
BBO #095180  
Catherine J. Keuthen  
BBO #373620  
Meyer, Connolly, Sloman  
& Macdonald LLP  
12 Post Office Square  
Boston, MA 02109  
(617) 423-2254

FRANK LILL & SON, INC.,  
By its attorneys,

*Leonard D. Zamansky*  
John J. McNamara  
BBO #557882  
Leonard D. Zamansky  
BBO #630206  
Domestico, Lane & McNamara, LLP  
161 Worcester Road  
Framingham, MA 01701  
(508) 626-9000

Dated: April 14, 2005

CERTIFICATE OF SERVICE

I, Leonard D. Zamansky, hereby certify that on April  
14, 2005, the foregoing was served via first class mail,  
postage prepaid, on the following:

Michael B. Meyer, Esquire  
Meyer, Connolly, Sloman & Macdonald, LLP  
12 Post Office Square  
Boston, MA 02109

*Leonard D. Zamansky*  
Leonard D. Zamansky

# EXHIBIT A

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action No.:05-10122 RGS

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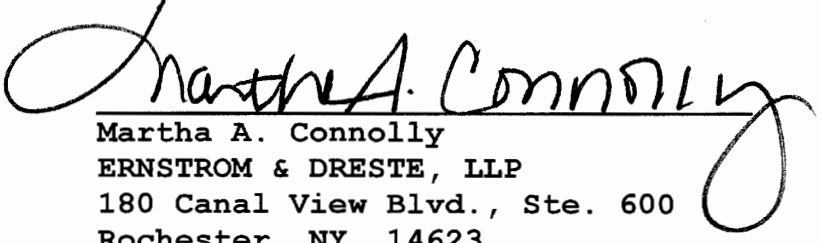
FRANK LILL & SON, INC.,	)
	)
Plaintiff,	)
	)
v.	)
	)
MEDICAL AREA TOTAL ENERGY	)
PLANT, INC.,	)
Defendant.	)

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CERTIFICATE OF MARTHA A. CONNOLLY

I, Martha A. Connolly, Esquire, pursuant to Local Rule 83.5.3(b), submit this Certificate in connection with Frank Lill & Son, Inc.'s ("Lill") assented-to motion that I be admitted pro hac vice for the purpose of representing Lill in this litigation only. I certify that: 1) I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice, specifically the State and Federal Courts of New York and the State Court of Connecticut; 2) there are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction; and 3) I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this 9<sup>th</sup>  
day of April, 2005.

  
Martha A. Connolly  
ERNSTROM & DRESTE, LLP  
180 Canal View Blvd., Ste. 600  
Rochester, NY 14623  
(585) 473-3100